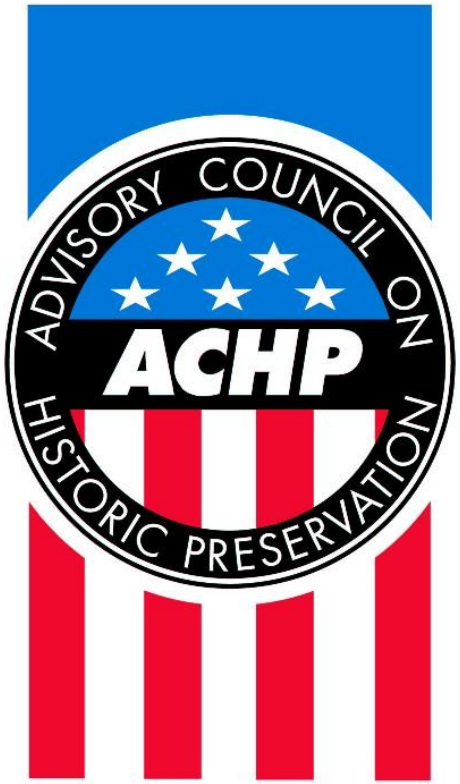

Conducting Section 106 Reviews under BRAC

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ACHP History with the BRAC Program

- ***MOAs and PAs for closed facilities***
  - ***Focused on buildings***
  - ***Little attention to archeology***
- ***Stakeholder participation limited to local communities (LRAs)***
- ***Mitigation plans resulted in retention and reuse***

Major Lessons Learned from Previous BRAC Rounds

- ***Consult early in the process***
- ***Improve NEPA coordination***
- ***Broaden stakeholder participation***
- ***Recognize complexities of covenants***
- ***Consider future remediation***
- ***Clarify roles and responsibilities for post-agreement reviews***

New Approaches to 106 Review for BRAC 2005

- ***Streamline reviews through program alternatives [36 CFR § 800.14(a) – (e)]***
- ***Prepare baseline information early***
- ***Identify standard mitigation measures for various types of conveyances***
- ***Develop ACHP policy regarding remediation impacts on redevelopment options***
- ***Develop tribal consultation protocols***

Impact to Historic Properties: Closure vs. Realignment

- **Closure requires consideration of discrete, more immediate preservation issues**
- **Realignment should focus on**
  - **Section 106 and Section 110 of NHPA**
  - **Long-term management**
  - **Indirect effects on historic properties**

Role of Consulting Parties

- ***Involvement of State and local preservationists is important***
- ***Role of developers should be addressed***
- ***Consider other parties, besides SHPOs to become covenant holders***
- ***Tribal consultation must be on a government-to government basis***

DoD & ACHP Collaboration: Improvements to Section 106 Reviews

- ACHP staff participates in DoD BRAC work groups
- ACHP membership involved in program alternatives
- ACHP established DoD BRAC task force to assist DoD
- ACHP and DoD must consider new strategies for streamlining BRAC review process

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